

**CALIFORNIA COASTAL COMMISSION**

SAN DIEGO AREA  
 7575 METROPOLITAN DRIVE, SUITE 103  
 SAN DIEGO, CA 92108-4421  
 (619) 767-2370



# Tue 21b

Filed: 2/1/06  
 49th Day: 3/22/06  
 180th Day: 7/21/06  
 Staff: LRO-SD  
 Staff Report: 2/16/06  
 Hearing Date: 3/7-10/06

REGULAR CALENDAR  
STAFF REPORT AND PRELIMINARY RECOMMENDATION

Application No.: 6-05-79

Applicant: T-Mobile USA, Inc.

Agent: PlanCom, Inc.;  
 Ted Marioncelli

Description: Installation of a wireless telecommunications facility consisting of a 55 ft. high monopine with three sectors of four antennas each for a total of 12 mounted antennas and an approximately 11-foot high, 160 sq.ft. equipment building and 5' high, 14' wide chain link fence with gate.

Site: Interstate-5 Northbound Rest Stop, located on the east side of I-5, Camp Pendleton Marine Base, San Diego County.

Substantive File Documents: Certified San Diego County Local Coastal Program (LCP); Coastal Development Permit Nos. 6-97-160, 6-98-74, 6-00-57, 6-00-159, 6-04-64, 6-04-65.

---

**STAFF NOTES:**

Summary of Staff's Preliminary Recommendation: Staff is recommending approval of the proposed communications facility with special conditions. Adverse impacts to visual resources is the primary issue associated with this project. In this case staff has concluded that potential impacts to the public viewshed along Interstate 5 (I-5) in the Camp Pendleton area have been addressed as designed by the applicant and as required in the attached special conditions. The project will be located on the east side of I-5 so no public view blockage issues arise with respect to ocean views. In addition, the proposed monopine has been designed to be situated adjacent to another similar monopine and also within an existing group of mature trees and landscaping, thus minimizing its visibility from I-5. With the proposed conditions potential visual impacts associated with the proposed development will be reduced to the maximum extent feasible, consistent with Chapter 3 policies of the Coastal Act.

Standard of Review: Chapter 3 policies of the Coastal Act.

---

I. PRELIMINARY STAFF RECOMMENDATION:

The staff recommends the Commission adopt the following resolution:

**MOTION:**     *I move that the Commission approve Coastal Development Permit No. 6-05-79 pursuant to the staff recommendation.*

**STAFF RECOMMENDATION OF APPROVAL:**

Staff recommends a **YES** vote. Passage of this motion will result in approval of the permit as conditioned and adoption of the following resolution and findings. The motion passes only by affirmative vote of a majority of the Commissioners present.

**RESOLUTION TO APPROVE THE PERMIT:**

The Commission hereby approves a coastal development permit for the proposed development and adopts the findings set forth below on grounds that the development as conditioned will be in conformity with the policies of Chapter 3 of the Coastal Act and will not prejudice the ability of the local government having jurisdiction over the area to prepare a Local Coastal Program conforming to the provisions of Chapter 3. Approval of the permit complies with the California Environmental Quality Act because either 1) feasible mitigation measures and/or alternatives have been incorporated to substantially lessen any significant adverse effects of the development on the environment, or 2) there are no further feasible mitigation measures or alternatives that would substantially lessen any significant adverse impacts of the development on the environment.

II. Standard Conditions.

See attached page.

III. Special Conditions.

The permit is subject to the following conditions:

1. Co-Location of Future Antennas. PRIOR TO THE ISSUANCE OF THE COASTAL DEVELOPMENT PERMIT, the applicant shall agree in writing to cooperate with other communication companies in co-locating additional antennas and/or equipment on the project site in the future, providing such shared use does not impair the operation of the approved facility. Upon the Commission's request, the permittee shall provide an independently prepared technical analysis to substantiate the existence of any practical technical prohibitions against the operation of a co-use facility.

2. Future Redesign. PRIOR TO THE ISSUANCE OF THE COASTAL DEVELOPMENT PERMIT, the applicant shall agree in writing that where future technological advances would allow for reduced visual impacts resulting from the proposed telecommunication facility, the applicant shall make those modifications which

would reduce the visual impact of the proposed facility. In addition, the applicant agrees that if, in the future, the facility is no longer needed, the applicant shall abandon the facility and be responsible for removal of all permanent structures and restoration of the site as needed to re-establish the area consistent with the character of the surrounding vegetation. Before performing any work in response to the requirements of this condition, the applicant shall contact the Executive Director of the California Coastal Commission to determine if an amendment to this coastal development permit is necessary.

3. Final Plans. PRIOR TO THE ISSUANCE OF THE COASTAL DEVELOPMENT PERMIT, the applicant shall submit to the Executive Director for review and written approval, final plans for the proposed monopine facility that have been approved by the Camp Pendleton Marine Base and which are in substantial conformance with the site plan prepared by Booth and Suarez Architecture, Commission date stamped received 8/18/2005 submitted with this application.

The permittee shall undertake development in accordance with the approved plans. Any proposed changes to the approved plans shall be reported to the Executive Director. No changes to the plans shall occur without a Coastal Commission approved amendment to this coastal development permit unless the Executive Director determines that no amendment is legally required.

#### IV. Findings and Declarations.

The Commission finds and declares as follows:

1. Detailed Project Description/Site History. Proposed is the installation of a wireless telecommunications facility consisting of a 55 ft. high monopine with 12 mounted antennas and a 11-foot high, 160 sq.ft. equipment building and a 5' high, 14' wide chain link fence with gate. The facility is proposed immediately adjacent to a similar telecommunications facility approved by the Coastal Commission which consists of a 67-foot high monopine with 24 panel antennas, three (3) four-foot long omni antennas; two (2) four-foot diameter microwave dishes; and one (1) BMR antenna mounted to the 516 sq.ft. equipment building located at the base of the pole (ref. CDP #6-00-159). The existing monopine currently supports two carriers.

The project site is located just east of the Interstate-5 (I-5) northbound rest stop (also referred to as the Aliso Creek Rest Stop) in the Camp Pendleton area of the County of San Diego, north of Oceanside. The rest stop is located on the top of a low rolling hill, which descends in elevation at both the south and immediate north ends. Many eucalyptus trees surround the rest stop. As one drives into the rest stop there is a large parking area off to the right. A restroom building is located to the left near the freeway. Further to the right is a large truck and vehicle parking area. The proposed monopine will be located just outside of this area to the east immediately adjacent to the rest stop on Camp Pendleton property and just west of the railroad tracks. The proposed facility will

be located in an area that is removed from any pedestrian and vehicular activities and will be fenced and screened with additional landscaping.

In August, 1998, the Commission approved (CDP #6-97-160, GTE) the installation of an unmanned cellular facility at the I-5 rest stop near the northeast corner (about 200 feet northwest of the proposed project site). The approved project consisted of a 77-foot tall monopole with 24 panel antennas; a 360 sq.ft. equipment building; two 6-foot diameter microwave dish antennas; three 4-foot long omni antennas; and one four-inch GPS antenna. The installation of the approved facility would have required the removal of several existing mature trees. This project however was never constructed, and the permit has subsequently expired.

Because there is no certified LCP for this area, the standard of review for this development is Chapter 3 policies of the Coastal Act.

2. Visual Resources. Section 30251 of the Coastal Act is applicable and states, in part:

The scenic and visual qualities of coastal areas shall be considered and protected as a resource of public importance. Permitted development shall be sited and designed to protect views to and along the ocean and scenic coastal areas, to minimize the alteration of natural land forms, to be visually compatible with the character of surrounding areas...

The project site is visible from I-5, which is a major public access route and is designated in the certified San Diego County LCP as a Scenic Corridor (Although the LCP was certified by the Commission, the City never formally accepted the proposed changes and it was therefore never “effectively certified”. As such, there is no certified LCP for this area.) As one drives north from Oceanside towards San Clemente, there is a stretch of highway (approximately 17 miles long) which essentially has no development on it other than Camp Pendleton structures (many of which are shielded from view due to existing topography). This stretch of highway is very scenic and offers beautiful panoramic views of the Pacific Ocean while looking west. According to the applicant, the project site was originally chosen as the preferred location to meet coverage objectives of the search area and the site allowed connectivity to a site at Las Pulgas on the north. It also allowed connectivity to the south at a future site which is proposed at Camp Del Mar on Camp Pendleton (currently proposed under pending CDP Permit Application #6-06-80 approximately 4-5 miles south of the subject site). The proposed location is also in an area that does not impact military training activities.

The applicant concludes that the alternatives analysis has resulted in a proposed location that avoids the potential for significant visual impacts. By locating the proposed facility next to an existing monopine and among mature landscaping at the far eastern end of the rest stop, it allows for the monopine to blend in with the existing mature landscaping, thus reducing the impacts on the coastal view corridor. Specifically, the applicant considered alternative sites as follows:

### Alternatives Considered

a) Co-location with existing Cingular Wireless Monopine – Co-location on the existing 67-foot tall monopine was originally considered as a potential site; however, the next available antenna placement was at a height of only 37 feet, which did not provide adequate coverage to the targeted area. In order for the proposed site to provide adequate coverage, it must be linked to the existing Las Pulgas site located north of the proposed facility. The lower antenna height available for co-location does not meet this objective on the existing monopine. Also, the site must be able to connect to the proposed site located at Camp Del Mar which would not be possible if it were placed at the 37 ft. height elevation on the exiting monopine.

The applicant has indicated that the only way to effectively co-locate on the existing artificial tree/monopine would be to remove the existing monopine and construct a much taller and larger monopine to support both facilities. Specifically, the pole of the existing tree would have to be taller and bigger in diameter because the applicant would need to install a coax (i.e., coaxial cable) in the existing artificial tree trunk which would need to be bigger thus making the tree not only wider but also about 10 ft. taller. Such a taller facility would make the facility much more visible from offsite locations.

b) Rest Stop on West side of I-5 – Although this would have provided a similar coverage footprint it would not only obstruct ocean views looking west along I-5, but would also pose an adverse visual impact due to its proximity to I-5 and its high visibility.

c) Base Open Space on East side of I-5 – This area is located east and north of the proposed I-5 rest stop. However, this area is used strictly for base training and the base could not support another wireless facility in this area. It is also currently the military base's policy to co-locate at existing wireless facility sites and, as such, the I-5 rest stop was the nearest and most logical location for the proposed facility as Base Command would not permit it to be constructed elsewhere.

The applicant has also indicated that the proposed site is part of a network of 14 sites within the boundaries of Camp Pendleton designed to provide coverage to the entire Marine Corps base. Constraints and limitations of topography, existing buildings and landscape all factor into designing both the network and location of each cell site. The overlapping coverage footprints of each site are combined to give coverage to the entire base. Camp Pendleton officials strongly urged co-location in the design of the network and only allow construction of a new vertical antenna structure where no other alternative is available. Of the 14 sites proposed on Camp Pendleton, only three sites are located in the Coastal Zone. The availability of telephone service is also a limitation in the site selection process. Some areas on Camp Pendleton do not have telephone service available and it is necessary to link the sites through microwave dishes to provide telephone service to all the sites in the network.

The subject site was chosen as the best alternative for location of the proposed wireless communications facility because the Base Command's preference is that the applicant construct a new monopine in the vicinity of the existing monopine in order to populate the area with another "tree". The visual impact of the two trees was determined to be less offensive than one taller tree. It was the Base Command's preference that instead of a larger more visually intrusive tree, that a second artificial tree be installed adjacent to the existing one. The Base Command has authorized the installation of the monopine at this location because all surrounding areas are training areas and are not available for cell sites.

It is important to note that in this particular case, the Commission approved the existing monopine on this site pursuant to CDP #6-00-159 with a special condition which required that there be "...co-location of any future proposed antennas and/or equipment on the project site in the future, providing such shared use does not impact the operation of the approved facility. Upon...request, the permittee shall provide an independently prepared technical analysis to substantiate the existence of any practical technical prohibitions against the operation of a co-use facility...". The applicant has submitted information that indicates that the proposed cellular antenna facility cannot be co-located with the existing monopine because it would not provide the service capabilities that are required due to necessary height requirements. As indicated above, the next available antenna placement was at a height of only 37 feet on the existing monopine, which does not provide adequate coverage to the targeted area. In order for the proposed site to provide adequate coverage, it must be linked to the existing Las Pulgas site located north of the proposed facility. The lower antenna height available for co-location does not meet this objective on the existing monopine. The Base Command also requires that new facilities co-locate at sites of existing facilities. As such, even though the proposed project represents a separate monopine facility, for the reasons cited above it can be found consistent with the intent of special conditions of CDP #6-00-159.

It should also be noted that when the Commission approved the first monopine at this location pursuant to CDP #6-00-159, it found that the proposed 67-foot high simulated pine tree design (monopine) would blend visually with existing mature trees and vegetation at the rest stop and for that reason was consistent with Section 30251 of the Coastal Act. The Commission also accepted an alternatives analysis that addressed the considerations involved in siting a wireless facility at the site. In summary, topography and existing structures in the area coupled with siting and coverage requirements resulted in the project site being the preferred choice. The proposed project would be sited immediately adjacent to this previously approved site.

Therefore, in summary, based on the above described alternatives analysis, the Commission finds that the proposed project is sited in a manner that will protect the scenic and visual qualities of the area, protect views and be visually compatible with the character of the surrounding area. While the proposed 55-foot high monopine will be partially visible from I-5, the project site will meet the goals of the application while minimizing impacts on visual resources. Additionally, as designed as a simulated pine tree adjacent to another simulated pine tree located among other natural trees at the rest

stop, the project's visual appearance will be minimized. The proposed monopine is also lower in height (55 ft.) vs. the existing 67 ft. tall monopine. Furthermore, due to improvements in the design of such monopine structures, the newly proposed monopine will appear much more "natural" than the existing monopine and will better camouflage the proposed cellular antenna panels (ref. Exhibit Nos. 3 and 4), thus further reducing the potential visual impacts associated with such a structure. Specifically, the proposed monopine is fuller and more realistic looking as compared to the existing monopine that is at the same site. For example, the tree branches on the newly proposed monopine begin at a height of 18 feet whereas the existing monopine's branches are located at a height of 30 or 35 feet to the top of the pole.

The proposed monopine is designed such that it can support from one to three additional carriers on the same pole (in the future) without having to make it bigger or taller. As such, future co-location on this facility for other carriers is feasible. In addition, the newly proposed equipment shelter will be similar in design and height (11 ft. high) and will match the existing shelter for the existing monopine located south of the existing structure. The exterior of the proposed structure will be painted the same color as the existing structure (off-white with yellow trim at roof overhang), and as such, should not result in an adverse visual impact. Based on the above discussion, the Commission finds the proposed 55-foot high monopine will not result in adverse visual impacts. The Commission concurs that the project will meet the siting criteria and coverage goals of the applicant while protecting the scenic and visual qualities of the area, protecting public views to the ocean and being visually compatible with the character of the area.

While the proposed facility will not have significant adverse impacts on the visual quality of the area, the Commission is concerned that cumulatively, installation of additional similar projects in the area could have adverse impacts on visual resources. When reviewing cellular antenna facility sites, the Commission must assure that the facility is the smallest in size and shortest in height that it can be, that it cannot be co-located with another existing site nearby or located elsewhere, in order to reduce any potential adverse impacts on visual resources and public views to the ocean associated with such facilities. As demand for wireless communication facilities increases, it is likely that other service providers will be interested in placing additional structures, antennas and equipment in the project area, and the Commission is concerned that cumulatively, installation of additional similar projects in the area could have adverse impacts on visual resources. In this case both cellular antenna towers have been designed as artificial trees so their visual impact has been minimized. But the Commission notes that this situation is an example of how multiple telecommunication facilities have the potential to cumulatively impact visual resources. The Commission wishes to go on record that co-location is the preferred way to provide future telecommunication services. If co-location is not possible, then the visual impacts of such structures must be mitigated either through project design or siting so as not to result in adverse cumulative visual impacts.

As such, Special Conditions #1 and #2 have been attached. Special Condition #1 requires that the applicant submit a written statement agreeing to cooperate with other communication facilities in co-locating additional antenna on the proposed development,

unless the applicant can demonstrate a substantial technical conflict to doing so. Special Condition #2 requires the applicant to submit a written statement agreeing to remove the structures and restore this site in the future should technological advances make this facility obsolete. In this way, it can be assured that the proliferation of these types of facilities can be limited to appropriate locations, and that the area will not be littered with outdated and obsolete facilities in the future. Special Condition #3 requires final plans that have been approved by the Camp Pendleton Marine Base and are in substantial conformance with the site plan submitted with the permit application. Therefore, as conditioned, the Commission finds the project is consistent with Chapter 3 policies of the Coastal Act with respect to preserving visual resources.

In summary, while the proposed facility will be 55-feet high, it will not result in public view blockage, will only be partially visible from I-5 and has been designed as a simulated pine tree next to another simulated pine tree and within a group of existing natural mature trees and landscaping at the rest stop site. Therefore, the Commission finds that, as conditioned, impacts to scenic coastal resources have been reduced to the maximum extent feasible, the scenic and visual qualities of the area and the views from the area have been protected, and the project is visually compatible with the character of the area, consistent with Section 30251 of the Coastal Act.

3. Local Coastal Planning. Section 30604 (a) also requires that a coastal development permit shall be issued only if the Commission finds that the permitted development will not prejudice the ability of the local government to prepare a Local Coastal Program (LCP) in conformity with the provisions of Chapter 3 of the Coastal Act. In this case, such a finding can be made.

The subject site is located on the Camp Pendleton Marine Base, a federally owned and operated military facility used by the United States Marine Corps and located in an unincorporated area of the County of San Diego which is not subject to local permit review by the County. In addition, although the project is subject to the Commission's Federal Consistency Review Process, the Commission's act of granting a coastal development permit to the applicant functions under the California Coastal Management Program as the equivalent of a concurrence under the Coastal Zone Management Act. Because there is no certified LCP for this area, the standard of review for this development is Chapter 3 policies of the Coastal Act. Based on the above discussion, the Commission finds that the proposed development, as conditioned, is consistent with all applicable Chapter 3 policies of the Coastal Act and no adverse impacts to coastal resources are anticipated. Thus, it will not prejudice the ability of the local government to prepare an LCP in conformity with the provisions of Chapter 3 of the Coastal Act.

4. California Environmental Quality Act (CEQA). Section 13096 of the California Code of Regulations requires Commission approval of a coastal development permit to be supported by a finding showing the permit to be consistent with any applicable requirements of the California Environmental Quality Act (CEQA). Section 21080.5(d)(2)(A) of CEQA prohibits a proposed development from being approved if there are feasible alternatives or feasible mitigation measures available which would

substantially lessen any significant adverse effect which the activity may have on the environment.

As discussed herein, the proposed project, as conditioned, will not cause significant adverse impacts to the environment. There are no feasible alternatives or mitigation measures available which would substantially lessen any significant adverse impact that the proposed activity may have on the environment. Therefore, the Commission finds the proposed project, as conditioned, is the least environmentally damaging feasible alternative and is consistent with the requirements of the Coastal Act to conform to CEQA.

STANDARD CONDITIONS:

1. Notice of Receipt and Acknowledgment. The permit is not valid and development shall not commence until a copy of the permit, signed by the permittee or authorized agent, acknowledging receipt of the permit and acceptance of the terms and conditions, is returned to the Commission office.
2. Expiration. If development has not commenced, the permit will expire two years from the date on which the Commission voted on the application. Development shall be pursued in a diligent manner and completed in a reasonable period of time. Application for extension of the permit must be made prior to the expiration date.
3. Interpretation. Any questions of intent or interpretation of any condition will be resolved by the Executive Director or the Commission.
4. Assignment. The permit may be assigned to any qualified person, provided assignee files with the Commission an affidavit accepting all terms and conditions of the permit.
5. Terms and Conditions Run with the Land. These terms and conditions shall be perpetual, and it is the intention of the Commission and the permittee to bind all future owners and possessors of the subject property to the terms and conditions.